



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NOV 30 2013

Mr. Paul F. Jarvis
Section Chief
Facilities and Logistics Services Division
Federal Bureau of Investigation
Quantico, VA 22135

RE: Work Plan Modification for Hybrid Plan for Self- Implementing On-Site Cleanup of PCB Remediation Waste from the Carpeting, HVAC System and Mechanical Rooms Painted Floors, Building 9 at the FBI Academy, Quantico, Virginia, EPA Case Tracking No. 2014-61-01

Dear Mr. Jarvis:

This letter is in response to the FBI Training Academy, Quantico, VA Work Plan Modification, dated September 30, 2013, provided to the U.S. Environmental Protection Agency Region III ("EPA") pursuant to the requirements of the *Self-implementing on-site cleanup and disposal of PCB remediation waste* regulation, 40 C.F.R. § 761.61(a), and the requirements of the *Risk Based Disposal Approval* regulation, 40 C.F.R. § 761.61(c) (Hybrid Cleanup Plan). This Work Plan Modification was received by the Land and Chemicals Division on November 4, 2013, and concerns changes to the FBI Training Academy's plan to clean up and dispose of polychlorinated biphenyl (PCB) waste located in Building 9 at the FBI Training Academy, Quantico, Virginia.

On August 19, 2013, EPA approved Plan for Self- Implementing On-Site Cleanup of PCB Remediation Waste from the Carpeting, HVAC System and Mechanical Rooms Painted Floors, Building 9 at the FBI Academy, Quantico, Virginia, EPA Case Tracking No. 2013-61-08. This Work Plan Modification seeks to modify the number of containment areas on the first floor and the number of confirmation samples on the first floor as described in the original Plan.

EPA has reviewed the FBI's Work Plan Modification for Building 9 and finds that the proposed changes to the original plan will create no unreasonable risk under the PCB regulations and the conditions of this Approval. EPA approves the increased number of containment areas for the first floor from one (1) to three (3) under 40 CFR § 761.61(a) and the increased number of confirmatory samples for the first floor from nine (9) to 14 under 40 CFR § 761.61(c).

EPA hereby approves the Work Plan Modification for the FBI Training Academy site. This approval is subject to the conditions and limitations set forth in 40 C.F.R. §§ 761.61(a) and 761.61(c). The approved plan may be further modified only in accordance with the procedures described at 40 C.F.R. § 761.61(a)(3)(ii).

This approval relates only to the remediation of the PCB contamination in Building Number 9 of the FBI Academy.

EPA is aware that there are several other PCB concerns at the site, which are not addressed in this Hybrid Plan. This approval is issued with the understanding that the following issue will be addressed in future submissions to EPA Region 3 by the FBI Training Academy: the identification, characterization, and disposition of PCB contaminated HVAC gaskets, PCB contaminated duct work and associated PCB contaminated dust throughout rest of the facility.

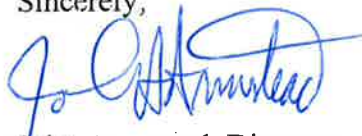
EPA's approval of the FBI's Work Plan Modification does not in any way constitute a finding by EPA that the FBI Training Academy site will be safe or appropriate for any future use, does not insulate the owner or occupant of the property from action under any applicable law, and does not relieve the FBI, or any other owner or operator of the FBI Training Academy site of its continuing responsibility to comply fully with 40 C.F.R. Part 761. EPA emphasizes that these regulations include several conditions and limitations that apply to persons performing a PCB cleanup activity subject to 40 C.F.R. § 761.61(a). Among other things, the regulations state that "[c]omplete compliance with 40 C.F.R. § 761.61 does not create a presumption against enforcement action for penalties for any unauthorized PCB disposal." 40 C.F.R. § 761.50(b)(3)(ii)(B). Further, "[a]ny person storing or disposing of PCBs is also responsible for determining and complying with all other applicable Federal, state, and local laws and regulations," 40 C.F.R. § 761.50(a)(6).

EPA is requesting that a brief summary of the completed cleanup activities, including but not limited to, characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; copies of manifests; copies of certificates of disposal or similar certifications issued by the disposer and total amounts of PCB waste disposed, be submitted within ninety (90) days of completion to:

U.S. Environmental Protection Agency
Region III
Kyle Chelius (3LC61)
Land and Chemicals Division
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Any questions concerning this approval or the self-implementing site cleanup plan review should be directed to Kyle Chelius, TSCA Compliance Officer, at (215) 814-3178.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Armstead", is written over the word "Sincerely,".

John Armstead, Director
Land and Chemicals Division

cc: Ms. Patricia McMurray (Virginia DEQ)